

**AIR QUALITY TIER I OPERATING PERMIT NUMBER: 083-00001****Permittee:** The Amalgamated Sugar Company, LLC**Date Issued:** December 17, 2002**Location:** Twin Falls, Idaho**Date Expires:** December 17, 2005*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***7. EMISSIONS UNIT GROUP 6: LIME KILNS (S-K1 & S-K2).****Summary Description**

The following paragraph and Table 7.1 are a narrative description of the lime kilns regulated in this Tier I permit. This description is for informational purposes only.

The coke-fired South Belgian lime kiln and North Belgian lime kiln were installed prior to 1970. The exhaust gas from the coke kilns is pulled from the top of the kilns and passes through gas washers. The gas washers are used to scrub and cool the exhaust gas prior to the compressors. The compressors convey the CO<sub>2</sub> gas to the first and second carbonation tanks in parallel. The gas is bubbled through the juice from the bottom of the carbonation tanks. During startup, the exhaust gas is pulled through the scrubber (P-K1/2D)

Table 7.1 describes the control devices used in controlling emissions from the lime kilns.

**Table 7.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

<b>Emissions Point/Source Identification</b>	<b>Emissions Unit(s) Identification</b>	<b>Emission Control Device</b>
P-K1/2A, P-K1/2B, & P-K1/2C	102 T/day coke-fired South Belgian Lime Kiln, 9.2 tons of coke per day (S-K1)	One gas washer (A - K1) and then two carbonation tanks in parallel
	238 T/day coke-fired North Belgian Lime Kiln, 21 tons of coke per day (S-K2)	Two gas washers in series (A-K2) and then two carbonation tanks in parallel
P-K1/2D	For both lime kilns	Bypass scrubber while charging the kiln

Table 7.2 contains a summary of requirements that apply generally to the lime kilns. Specific permit requirements are listed below Table 7.2.

**Table 7.2 APPLICABLE REQUIREMENTS SUMMARY**

<b>Permit Conditions</b>	<b>Affected Emission Unit</b>	<b>Parameter</b>	<b>Permit Limit/ Standard Summary</b>	<b>Applicable Requirement Reference</b>	<b>Monitoring and Recordkeeping Requirements</b>
1.7	Each emission point	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 7.2, 7.3, 1.11
7.1	Each lime kiln	PM	Process weight	IDAPA 58.01.01.702	7.2, 7.3, 1.11

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**Permit Limits/Operating Requirements**

7.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

7.2 The permittee shall, at all times, maintain and operate the gas washers, carbonation units and tanks, and scrubbers in accordance with the O&M manual, or as efficiently as practicable. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

**Operations and Maintenance Manual**

7.3 The permittee shall develop an O&M manual within one year of permit issuance. The O&M manual is part of the terms and conditions of the permit

- The permittee shall update the control device monitoring program in the O&M manual as necessary. The permittee may update the O&M manual at any time during the permit term.
- The O&M manual shall address the operation, maintenance, and repair of the gas washers, carbonation units and tanks, and scrubbers to ensure that they are in good working order and operated as efficiently as practicable. The manual shall, at a minimum, include a general description of the control devices; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
- The O&M manual shall include a control device-monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The control device-monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
- The O&M manual shall be maintained onsite and made available to Department representatives upon request.

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- Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with Permit Condition 1.9.  
[IDAPA 58.01.01.322.01, 3/19/99, IDAPA 58.01.01.322.06, 07, 5/1/94]

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**8. EMISSIONS UNIT GROUP 7: PROCESS SLAKER (S-K4)****Summary Description**

The following paragraph and Table 8.1 are a narrative description of the process slaker regulated in this Tier I permit. This description is for informational purposes only.

The process slaker produces milk of lime from crushed calcium oxide rocks and water. The process slaker is a batch process, per the 1995 application. The emissions from the process slaker are controlled by a cyclone

Table 8.1 describes the devices used to control emissions from the process slaker.

**Table 8.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

Emission Point/ Source Identification	Emissions Unit(s) Identification	Emissions Unit(s) Identification	Emission Control Device
P-K3	Maximum 9.0 ton CaO per day	Flume slaker (S-K3)	None
P-K4	Maximum 190 ton CaO per day	Process slaker (S-K4)	One cyclone

Table 8.2 contains a summary of requirements that apply generally to the slakers. Specific permit requirements are listed below Table 8.2.

**Table 8.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Affected Emission Unit	Parameter	Permit Limit/ Standard Summary	Applicable Requirement Reference	Monitoring and Recordkeeping Requirements
1.7	Flume slaker	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 8.2, 8.3, 1.11
1.7	Process slaker				
8.1	Flume slaker and process slaker together	PM	Process weight	IDAPA 58.01.01.702	8.2, 8.3, 1.11

**Permit Limits/Operating Requirements**

8.1 No person shall emit to the atmosphere from any process or process equipment commencing operation on or after October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

a. If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.702, 4/5/00]

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- 8.2 The permittee shall, at all times, maintain and operate the cyclone in accordance with the O&M manual, or as efficiently as practicable. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

***Operations and Maintenance Manual***

- 8.3 The permittee shall develop an O&M manual within one year of permit issuance. The O&M manual is part of the terms and conditions of the permit.

- The permittee shall update the control device monitoring program in the O&M manual as necessary. The permittee may update the O&M manual at any time during the permit term.
- The O&M manual shall address the operation, maintenance, and repair of the process slaker's cyclone to ensure that it is in good working order and operated as efficiently as practicable. The manual shall, at a minimum, include a general description of the control device; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
- The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The control device-monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
- The O&M manual shall be maintained onsite and made available to Department representatives upon request.
- Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this Permit Condition, if appropriate. All deviations shall be reported in accordance with Permit Condition 1.9.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

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The following paragraph and Table 9.1 are a narrative description of the drying granulator regulated in this Tier I permit. This description is for informational purposes only.

The facility operates a drying granulator to dry wet sugar. The PM emissions (sugar particles) from the drying granulator are controlled by a rotoclone-type scrubber.

Table 9.1 describes the devices used to control emissions from the drying granulator.

**Table 9.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

Emission Point/Source Identification	Emissions Unit(s) Identification	Emission Control Device
P-W1	1,100 tons-per-day Drying granulator (S-W1)	Rotoclone-type scrubber (A - W1)

Table 9.2 contains a summary of requirements that apply generally to the drying granulator. Specific permit requirements are listed below Table 9.2.

**Table 9.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirement Reference	Monitoring and Recordkeeping Requirements
1.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 9.2, 9.3, 1.11
9.1	PM	Process weight	IDAPA 58.01.01.702	9.2, 9.3, 1.11

**Permit Limits/Operating Requirements**

9.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in lb/hr, and PW is the process weight in lb/hr:

- a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

**[IDAPA 58.01.01.702, 4/5/00]**

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- 9.2 The permittee shall, at all times, maintain and operate the scrubber in accordance with the O&M manual, or as efficiently as practicable. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

**Operations and Maintenance Manual**

- 9.3 The permittee shall develop an O&M manual within one year of permit issuance. The O&M manual is part of the terms and conditions of the permit.
- The permittee shall update the control device monitoring program in the O&M manual as necessary. The permittee may update the O&M manual at any time during the permit term.
  - The O&M manual shall address the operation, maintenance, and repair of the drying granulator's scrubber to ensure that it is in good working order and operated as efficiently as practicable. The manual shall, at a minimum, include a general description of the control device; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
  - The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The control device-monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
  - The O&M manual shall be maintained onsite and made available to Department representatives upon request.
  - Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this Permit Condition, if appropriate. All deviations shall be reported in accordance with Permit Condition 1.9.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

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The following paragraph and Table 10.1 are a narrative description of the cooling granulator regulated in this Tier I permit. This description is for informational purposes only.

The facility operates one cooling granulator to cool hot sugar from the drying granulator. The cooling granulator is a batch process. Emissions from the cooling granulator are controlled by an emissions box-type scrubber.

Table 10.1 describes the devices used to control emissions from the cooling granulator.

**Table 10.1 CONTROL DEVICES**

<b>Emission Point/Source Identification</b>	<b>Emissions Unit(s) Identification</b>	<b>Emission Control Device</b>
P-W2	1,100 ton-per-day granulator (S-W2)	Emissions box-type scrubber (A - W2)

Table 10.2 contains a summary of requirements that apply generally to the cooling granulators. Specific permit requirements are listed below Table 10.2.

**Table 10.2 APPLICABLE REQUIREMENTS SUMMARY**

<b>Permit Conditions</b>	<b>Affected Emission Unit</b>	<b>Parameter</b>	<b>Permit Limit/ Standard Summary</b>	<b>Applicable Requirement Reference</b>	<b>Monitoring &amp; Recordkeeping Requirements</b>
1.7	Cooling Granulator	Visible emissions	20% for more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 10.2, 10.3, 10.5, 10.6, 1.11
10.1	Cooling Granulator	PM	Process weight	IDAPA 58.01.01.702	10.2, 10.3, 10.4, 10.5, 10.6, 1.11



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**Permit Limits/Operating Requirements**

10.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

10.2 The permittee shall, at all times, maintain and operate the scrubber in accordance with the O&M manual, or as efficiently as practicable. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

**Compliance Testing**

10.3 A compliance test shall be conducted within the first 12 months of this permit term to demonstrate compliance with Permit Condition 10.1. Testing shall be conducted in accordance with IDAPA 58.01.01.157, Permit Condition 1.20, and the following:

- The permittee shall conduct a PM compliance test using the test outlined in 40 CFR 60, Appendix A, Method 5, or such comparable and equivalent method approved in accordance with IDAPA 58.01.01.157. Test methods and procedures shall comply with IDAPA 58.01.01.157.
- A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
- The permittee shall monitor and record the throughput of the cooling granulator and water flow to the sprays in gallons per minute.
- The permittee shall record and maintain information required under Permit Condition 10.3 in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 09, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

**Monitoring and Recordkeeping**

10.4 The permittee shall monitor and record the throughput to the cooling granulator once per day when operating. All records shall be maintained in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

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- 10.5 The permittee shall install, operate, calibrate, and maintain a monitoring device to continuously measure the scrubber water flow rate. The flow rate shall be recorded weekly and the records maintained in accordance with Permit Condition 1.11. In the event the monitoring device becomes inoperable, it shall be repaired or replaced as soon as practicable.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

**Operations and Maintenance Manual**

- 10.6 The permittee shall develop an initial O&M manual based on the results and operating parameters of the first-year compliance test that demonstrates compliance with this permit. This initial O&M manual shall be developed no later than six months after completion of the first-year compliance test that demonstrates compliance with this permit. The O&M manual is part of the terms and conditions of the permit.

- The permittee shall update the control device monitoring program in the O&M manual after each compliance test. The permittee may update the O&M manual at any time during the permit term.
- The O&M manual shall address the operation, maintenance, and repair of the cooling granulator's scrubber to ensure that it is in good working order and operated as efficiently as practicable. The manual shall, at a minimum, include a general description of the control device; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
- The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The monitoring parameters shall include, but are not limited to, parameters required in Permit Condition 10.5, unless the Department approves their removal from this permit condition. The control device-monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
- The O&M manual shall be maintained onsite and made available to Department representatives upon request.
- Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards (i.e., Permit Conditions 10.1), unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this Permit Condition, if appropriate. All deviations shall be reported in accordance with Permit Condition 1.9.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

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The following and Table 11.1 are narrative descriptions of the pulp dryer material handling baghouse, lime kiln building material handling baghouses (2), main mill vents, and sulfur stove regulated in this Tier I permit. This description is for informational purposes only.

The pulp dryer material handling baghouse is used to control the emissions from the pulp dryer material handling processes. The handling process was installed prior to 1970. This is a batch process and with significant hourly variability and a maximum daily throughput of 469 T/day.

One of the two lime kiln building material handling baghouses is used to control the emissions from the lime kiln building material handling processes. The other lime kiln building material handling baghouse is used to control the emissions from the limerock bin, coke east transition, coke west transition, north lime kiln, south lime kiln, and north burnt rock conveyor transition. The handling process was installed prior to 1970. This is a batch process and with significant hourly variability. The maximum daily throughput is 340 tons per day.

The thin juice is processed in the main mill. The main mill was installed prior to 1970. The maximum hourly throughput of the main mill is 105 gallons of thin juice. Volatile organic compounds are the primary emissions from the main mill.

A sulfur stove burns sulfur to generate the SO<sub>2</sub> used in the juice purification stage. The sulfur stove was installed prior to 1970. This is a batch process with significant hourly variability. The maximum daily throughput is 1.8 tons of sulfur. The main emission from this source is SO<sub>2</sub>.

Table 11.1 describes the devices used to control emissions from the pulp dryer material handling baghouse.

**Table 11.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

<b>Emissions Point/Source Identification</b>	<b>Emissions Unit(s) Identification</b>	<b>Emission Control Device</b>
P-D4	Pulp dryer material handling (S-D4)	Baghouse (A - D4)
P-K5A	Lime kiln material handling (S-K5)	Baghouse (1, A - K5A)
P-K5B		Baghouse (2, A - K5B)
N/A	Main mill (S-O5)	Vents
P-O6	Sulfur stove (S-O6)	Sulfur tower (A -O6)

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Table 11.2 contains a summary of requirements that apply generally to pulp dryer material handling baghouses regulated in the permit. Specific permit requirements are listed below Table 11.2.

**Table 11.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Affected Emissions Unit	Parameter	Permit Limit/ Standard Summary	Applicable Requirement Reference	Monitoring and Recordkeeping Requirements
1.7	P-04, P-K5A, P-K5B, main mill vents, and P-06	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	11.2-11.4, 1.11
11.1	P-04, P-K5A, and P-K5B	PM	Process weight	IDAPA 58.01.01.702	11.2 -11.4, 1.11

**Permit Limits/Operating Requirements**

11.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

11.2 The permittee shall, at all times, maintain and operate each baghouse in accordance with the O&M manual, or as efficiently as practicable. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

**Monitoring and Recordkeeping**

11.3 The permittee shall install, operate, calibrate, and maintain monitoring devices to continuously measure the pressure drop across the baghouse. The pressure drop shall be recorded weekly and the records maintained in accordance with Permit Condition 1.11. In the event the monitoring device becomes inoperable, it shall be repaired or replaced as soon as practicable.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

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**Operations and Maintenance Manual**

11.4 The permittee shall develop an O&M manual within one year of permit issuance. The O&M manual is part of the terms and conditions of the permit.

- The permittee shall update the control device monitoring program in the O&M manual as necessary. The permittee may update the O&M manual at any time during the permit term.
- The O&M manual shall address the operation, maintenance, and repair of each baghouse to ensure that they are in good working order and operate as efficiently as practicable. The manual shall, at a minimum, include a general description of the control devices; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
- The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The monitoring parameters shall include, but are not limited to, parameters required in Permit Condition 11.3, unless the Department approves their removal from this permit condition. The control device-monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
- The O&M manual shall be maintained onsite and made available to Department representatives upon request.
- Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards (i.e., Permit Conditions 11.1), unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this Permit Condition, if appropriate. All deviations shall be reported in accordance with the Permit Conditions 13.24 and 13.25, and Permit Condition 1.9, if applicable.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

**AIR QUALITY TIER I OPERATING PERMIT NUMBER: 083-00001**

**Permittee:** The Amalgamated Sugar Company, LLC

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**12. NON-APPLICABILITY DETERMINATION**

12.1 IDAPA 58.01.01.675, Fuel-burning Equipment - Particulate Matter, does not apply to the pulp dryers under Section 5 of this permit or lime kilns under Section 11 of this permit.

12.2 The grain-loading standard (0.1 gr/dscf) in Section 1.1 of existing Permit No. 1020-0001 issued on February 14, 1984 does not apply to the pulp dryers under Section 5 of this permit.

12.3 40 CFR 60 Subpart D, Standards of Performance for Fossil-fuel-fired Steam Generators for Which Construction is Commenced After August 17, 1971, does not currently apply to the B&W Boiler.

**[IDAPA 58.01.01.325, 5/1/94]**

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### **13. TIER I OPERATING PERMIT GENERAL PROVISIONS**

#### **General Compliance**

- 13.1 The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]

- 13.2 It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.

[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

- 13.3 Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

#### **Reopening**

- 13.4 This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.

[IDAPA 58.01.01.322.15.c, 5.1.94; IDAPA 58.01.01.386, 3/19/99;  
40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

- 13.5 The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

#### **Property Rights**

- 13.6 This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

#### **Information Requests**

- 13.7 The permittee shall furnish all information requested by the Department, within a reasonable time, that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 5/1/94; IDAPA 58.01.01.322.15.f, 4/5/00;  
40 CFR 70.6(a)(6)(v)]

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- 13.8 Upon request, the permittee shall furnish to the Department copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

**Severability**

- 13.9 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

**Changes Requiring Permit Revision or Notice**

- 13.10 The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/5/00; IDAPA 58.01.01.322.15.i, 380-386, 3/19/99; 40 CFR 70.4(b)(12), (14), (15), 70.7(d), (e)]

- 13.11 Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. Section 502(b)(10), of the CAA, changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 3/19/99; IDAPA 58.01.01.209.05, 5/1/94; 40 CFR 70.4(b)(14), (15)]

**Federal and State Enforceability**

- 13.12 Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by the Department in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1), (2)]

- 13.13 Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]



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***Inspection and Entry***

13.14 Upon presentation of credentials, the permittee shall allow the Department or an authorized representative of the Department to do the following:

- a. Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

***New Requirements During Permit Term***

13.15 The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94;  
40 CFR 70.6(c)(3) citing 70.5(c)(8)]

***Fees***

13.16 The owner or operator of a Tier I source shall pay annual registration fees to the Department in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.

[IDAPA 58.01.01.322.15.n, 5/1/94; 40 CFR 70.6(a)(7)]

***Certification***

13.17 All documents submitted to the Department shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

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**Renewal**

- 13.18 a. The owner or operator of a Tier I source shall submit an application to the Department for a renewal of this permit at least six months before, but no earlier 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

- b. If a timely and complete application for a Tier I operating permit renewal is submitted, but the Department fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

**Permit Shield**

- 13.19 Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or

- i. The Department has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.

- b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).

- c. Nothing in this permit shall alter or affect the following:

- i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
- ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
- iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of the Department to obtain information from a source pursuant to Idaho Code 39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 322.15.m, 325, 5/1/94; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

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***Compliance Schedule and Progress Reports***

- 13.20 a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 10, 5/1/94; 40 CFR 70.6(c)(3), (4)]

***Periodic Compliance Certification***

- 13.21 The permittee shall submit compliance certifications during the term of the permit for each emissions unit to the Department and the EPA as follows:
- a. Compliance certifications for all emissions units shall be submitted annually beginning 12 months from the permit issuance date, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by the Department;
- b. The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
- c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
- i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
- ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;

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- iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 13.21.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
  - iv. Such other facts as the Department may require to determine the compliance status of the source.
- d. All original compliance certifications shall be submitted to the Department and a copy of all compliance certifications shall be submitted to the EPA.  
[IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946, 10/22/97; 40 CFR 70.6(c)(5)(iv)]

***False Statements***

- 13.22 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report, as required under this permit, or any applicable rule or order in force pursuant thereto.  
[IDAPA 58.01.01.125, 3/23/98]

***No Tampering***

- 13.23 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.  
[IDAPA 58.01.01.126, 3/23/98]

***Semiannual Monitoring Reports***

- 13.24 In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months starting six months from the date of permit issuance. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.  
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

***Reporting Deviations and Excess Emissions***

- 13.25 The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.  
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

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***Permit Revision Not Required***

- 13.26 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.  
[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

***Emergency***

- 13.27 In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.  
[IDAPA 58.01.01.332.01, 3/19/99; 40 CFR 70.6(g)]